

C. DUKES SCOTT  
EXECUTIVE DIRECTOR

P.O. Box 11263  
Columbia, S.C. 29211



Phone: (803) 737-0800  
Fax: (803) 737-0801

DAN E. ARNETT  
CHIEF OF STAFF

178482

March 15, 2006

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
1600 William Street, Ste 5200  
Columbia, SC, 29201

RECEIVED  
2006 MAR 15 PM 4:34  
SOUTH CAROLINA  
COMMISSION

RE: Application of Palmetto Utility Protection Service, Incorporated for Assignment  
of the 811 Abbreviated Dialing Code to Be Implemented in South Carolina  
**Docket No. 2005-390-C**

Dear Mr. Turner:

Please find enclosed and served on you the Office of Regulatory Staff's Second Continuing Data Requests in the above referenced matter. Please let me know if you have any questions.

Sincerely,

Nanette S. Edwards

NSE/pjm

Enclosure

cc: Mr. Charles L.A. Terreni

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2005-390-C**

RECEIVED  
2005 MAR 15 PM 4:34  
SC PUBLIC SERVICE  
COMMISSION

<b>IN RE: Application of Palmetto Utility</b>	)	<b>OFFICE OF REGULATORY</b>
<b>Protection Services, Inc. for</b>	)	<b>STAFF'S SECOND CONTINUING</b>
<b>Assignment of the 811 Abbreviated</b>	)	<b>DATA REQUEST</b>
<b>Dialing Code in South Carolina</b>	)	

**TO: Patrick Turner Counsel for BellSouth Telecommunications, Inc.:**

Pursuant to S.C. Code Ann. Section 58-4-10, 58-4-50, and 58-4-55, as enacted by 2004 S.C. Acts 175, and 26 S.C. Code Regs. 103-853 (Supp. 2003), the Office of Regulatory Staff hereby serves the within Data Requests upon BellSouth Telecommunications, Inc., (hereafter referred to as "BellSouth").

The Office of Regulatory Staff hereby requests, pursuant to 26 S.C. Code Regs. 103-853 (Supp. 2003), that you answer the following data requests in writing and under oath within ten (10) days after service at the Office of Regulatory Staff, 1441 Main Street, Suite 300, Columbia, South Carolina, 29201. If you are unable to respond to any of the data requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these data requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. When asked to identify a document, "identify" means to provide a full and detailed description of the

document. In lieu of providing a full and detailed description of a document, you may attach to your responses a copy of the document and identify the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this data request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

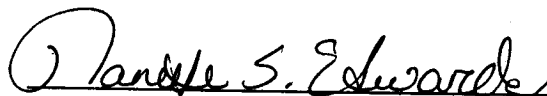
- I. That all information shall be provided to the South Carolina Office of Regulatory Staff in the format requested.
- II. That all responses to the data requests below be labeled using the same numbers as used herein.
- III. That any inquiries or communications relating to questions concerning clarification of the data requested below should be directed to Jim McDaniel or Mak Moore, of the South Carolina Office of Regulatory Staff.
- IV. That this entire list of questions be reproduced and included in front of each set of responses.
- V. That each question be reproduced and placed in front of the response provided.
- VI. That BellSouth provide six (6) paper copies of responses to the South Carolina Office of Regulatory Staff. In addition and if technically feasible, it is requested that BellSouth provide an electronic version of the responses.

- X. If the response to any data request is that the information requested is not currently available, please state when the information requested will be available.
- XI. That in addition to the signature and verification at the close of BellSouth's responses, the BellSouth witness(es) or employee(s) or agent(s) responsible for the information contained in each response be indicated.
- XII. This Data Request shall be deemed to be continuing so as to require BellSouth to supplement or amend its responses as any additional information becomes available.
- XIII. For information requested herein where the information is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.

#### **DATA REQUESTS**

- 2.1 What, if any, charges does BellSouth seek to assess to Palmetto Utility Protection Services, Inc., to interconnected carriers, or to individuals using the 811 number?
- 2.2 Does BellSouth intend to tariff the 811 service? If yes, please provide the tariff page containing the rates, terms and conditions of the 811 service.

March 15, 2006



Nanette S. Edwards Esquire  
**SC Office of Regulatory Staff**  
P.O. Box 11263  
Columbia, South Carolina 29211  
Phone: (803) 737-0575  
Fax: (803) 737- 0895  
Email:nsedwar@regstaff.sc.gov